

GARMAN TURNER GORDON LLP  
 GERALD M. GORDON  
 Nevada Bar No. 229  
 E-mail: ggordon@gtg.legal  
 JARED SECHRIST  
 Nevada Bar No. 10439  
 E-mail: jsechrist@gtg.legal  
 7251 Amigo St., Suite 210  
 Las Vegas, Nevada 89119  
 Tel: (725) 777-3000 / Fax: (725) 777-3112

MICHAEL D. NAPOLI, ESQ.  
*Pro hac vice*  
 AKERMAN LLP  
 2001 Ross Avenue, Suite 3600  
 Dallas, Texas 75201  
 Tel: (214) 720-4360 / Fax: (214) 720-8116  
 ARIEL E. STERN, ESQ.  
 Nevada Bar No. 8276  
 AKERMAN LLP  
 1635 Village Center Circle, Suite 200  
 Las Vegas, Nevada 89134  
 Tel: (702) 634-5000 / Fax: (702) 380-8572  
 Email: ariel.stern@akerman.com

*Attorneys for Tecumseh–Infinity Medical  
 Receivable Fund, LP*

**IN THE UNITED STATES BANKRUPTCY COURT  
 FOR THE DISTRICT OF NEVADA**

In re:  
 INFINITY CAPITAL MANAGEMENT, INC.  
 Debtor.

Case No. 21-14486-abl  
 Chapter 7

HASELECT-MEDICAL RECEIVABLES  
 LITIGATION FINANCE FUND  
 INTERNATIONAL SP,

Plaintiff,

v.

TECUMSEH-INFINITY MEDICAL  
 RECEIVABLES FUND, LP,

Defendant.

Adversary Case No. 21-01167-abl

**STIPULATION TO EXTEND  
 DISCOVERY DEADLINES  
 (SECOND REQUEST)**

TECUMSEH-INFINITY MEDICAL  
RECEIVABLES FUND, LP,

Counter-Claimant,

v.

HASELECT-MEDICAL RECEIVABLES  
LITIGATION FINANCE FUND  
INTERNATIONAL SP,

Counter-Defendant.

HASELECT-MEDICAL RECEIVABLES  
LITIGATION FINANCE FUND  
INTERNATIONAL SP,

Counter-Claimant

v.

TECUMSEH-INFINITY MEDICAL  
RECEIVABLES FUND, LP,

Counter-Defendant.

**STIPULATION TO EXTEND DISCOVERY DEADLINES  
(SECOND REQUEST)**

Tecumseh-Infinity Medical Receivables Fund, LP ("Tecumseh"), by and through its undersigned counsel, and HASElect-Medical Receivables Litigation Finance Fund International SP ("HASElect"), by and through its undersigned counsel (each a "Party" and, collectively, the "Parties"), hereby agree and stipulate, pursuant to Local Rule 7026, to extend discovery deadlines as follows:

**A. Discovery Completed**

The following discovery has been completed:

1. On or about January 12, 2022, HASElect served a subpoena on nonparty Three Bell Capital.
2. On or about January 12, 2022, HASElect served a subpoena on nonparty Jonathan

Porter.

3. On or about January 17, 2022, Tecumseh served its Initial Disclosures pursuant to FRCP 26 on HASelect.

4. On or about January 18, 2022, HASelect served its Initial Disclosures pursuant to FRCP 26 on Tecumseh.

5. On or about March 10, 2022, HASelect served its First Set of Interrogatories and Requests for Production on Tecumseh.

6. On or about March 29, 2022, Tecumseh served its First Set of Requests for Production on HASelect.

7. On or about April 18, 2022, Tecumseh served its Responses to HASelect's First Set of Interrogatories and Requests for Production.

8. On or about May 18, 2022, HASelect served its Responses to Tecumseh's First Set of Requests for Production.

9. On or about August 29, 2022, Tecumseh served its First Set of Interrogatories and Requests for Admission as well as its Second Set of Requests for Production on HASelect.

10. On or about September 9, 2022, HASelect served its deposition notice for the deposition of Tecumseh.

11. On or about September 9, 2022, HASelect served deposition subpoenas on various nonparties.

12. On or about September 28, 2022, HASelect served its Responses to Tecumseh's First Set of Interrogatories and Requests for Admission as well as its Second Set of Requests for Production on HASelect.

13. On or about November 28, 2022, Tecumseh served its Third Set of Requests for Production on HASelect.

14. On or about December 2, 2022, Tecumseh served its Subpoena to Produce Documents to GPMicro, Inc.

**B. Discovery Remaining**

Discovery in this case has been ongoing and additional discovery remains to be completed,

including, but not limited to:

1. Depositions of each party or the party's representative(s);
2. Depositions of various third parties;
3. Responses to outstanding written discovery;
4. Supplementation of prior written discovery;
5. Meet and confer regarding allegedly deficient discovery responses; and
6. Possible motion practice regarding allegedly deficient discovery responses.

The Parties reserve their right to take additional depositions based on information disclosed in produced documents or obtained in the depositions the Parties have identified.

**C. Reasons Why Discovery Will Not Be Completed Within the Time Limit of the Existing Deadlines**

This case is complex and involves thousands of accounts receivable purchased from more than 100 different medical providers. While this Court has already ruled on some of the issues regarding a subset of the accounts receivable at issue, other accounts receivable remain that require further discovery and analysis. The Parties have worked diligently by engaging in discovery from the outset of this case, but the extent of the documents produced in this matter are voluminous and require additional time for review. Further, although depositions have been noticed, they will likely need to be pushed back to accommodate the Parties as well as non-party deponents' schedules. There are also outstanding issues regarding allegedly deficient discovery responses that will require that the Parties meet and confer, which may also require motion practice.

Further, the Parties have engaged in dispositive motion practice. Currently pending before this Court is Tecumseh's Motion for Partial Summary Judgment [ECF No. 90]. The Court's decision on that Motion may inform the additional discovery needs of this case.

The Parties believe that, given the situation as it presently exists, discovery cannot be accomplished by the represented deadlines in the Order Granting the Parties' Stipulation to Extend Discovery Deadlines (First Request) on file herein [ECF No. 115]. This second stipulation to extend the existing discovery deadlines is brought in good faith and not for the purpose of delay. Based on

1 the information presented in this Stipulation, the Parties believe that good cause exists to extend  
2 discovery as proposed in order to permit the Parties to ensure that discovery is conducted in a  
3 thorough manner.

4 **D. Proposed Agreement and Amended Discovery Schedule**

5 Based on the foregoing, and other good valuable consideration, the receipt and sufficiency  
6 of which are acknowledged, the Parties stipulate and agree as follows, subject only to entry of the

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proposed order by this court approving this Stipulation, substantially in the form attached hereto as **Exhibit A**:

1. The Parties agree to extend the discovery deadlines as follows:

Event Deadline	Current Date	Proposed Date
Close of Fact Discovery	12/30/2022	1/30/2023
Dispositive Motion Deadline	1/31/2023	3/2/2023
Final List of Witnesses and Exhibits	2/28/2023	3/16/2023
Expected trial ready date	3/31/2023	3/31/2023

2. This matter is presently scheduled to go to trial beginning on April 3, 2023. The extension of discovery deadlines requested herein will not require any continuance of this trial date.

**IT IS SO STIPULATED.**

GARMAN TURNER GORDON LLP

SHEA LARSEN

By: /s/ Jared Sechrist  
 GERALD M. GORDON, ESQ.  
 JARED SECHRIST, ESQ.  
 7251 Amigo St., Suite 210  
 Las Vegas, Nevada 89119

/s/ Bart Larsen  
 Bart K. Larsen, Esq.  
 Nevada Bar No. 8538  
 Kyle M. Wyant, Esq.  
 Nevada Bar No. 14652  
 1731 Village Center Circle, Suite 150  
 Las Vegas, Nevada 89134

and  
 MICHAEL D. NAPOLI, ESQ.  
*Pro hac vice*

*Attorneys for HASelect-Medical Receivables  
 Litigation Finance Fund International SP*

AKERMAN LLP  
 2001 Ross Avenue, Suite 3600  
 Dallas, Texas 75201  
 Tel: (214) 720-4360 / Fax: (214) 720-8116

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 Nevada Bar No. 8276  
 AKERMAN LLP  
 1635 Village Center Circle, Suite 200  
 Las Vegas, Nevada 89134  
 Tel: (702) 634-5000 / Fax: (702) 380-8572  
 Email: [ariel.stern@akerman.com](mailto:ariel.stern@akerman.com)  
*Attorneys for Tecumseh-Infinity Medical  
 Receivable Fund, LP*

# EXHIBIT A

# EXHIBIT A

GARMAN TURNER GORDON LLP  
 GERALD M. GORDON  
 Nevada Bar No. 229  
 E-mail: ggordon@gtg.legal  
 JARED SECHRIST  
 Nevada Bar No. 10439  
 E-mail: jsechrist@gtg.legal  
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RECEIVABLES FUND, LP,

Counter-Defendant.

**ORDER GRANTING STIPULATION TO EXTEND DISCOVERY DEADLINES  
(SECOND REQUEST)**

The Court having considered the *Stipulation to Extend Discovery Deadlines and Trial Readiness Date (Second Request)* (“**Stipulation**”),<sup>1</sup> by and between Tecumseh-Infinity Medical Receivables Fund, LP (“Tecumseh”), by and through its undersigned counsel, and HASElect-Medical Receivables Litigation Finance Fund International SP (“HASElect”), by and through its undersigned counsel, and finds that good cause exists to grant the relief requested. Accordingly:

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...

<sup>1</sup> Any capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Stipulation.

**IT IS ORDERED** that the Stipulation is approved in its entirety.

**IT IS FURTHER ORDERED** that the discovery deadlines are extend as follows:

Event Deadline	Current Date	Proposed Date
Close of Fact Discovery	12/30/2022	1/30/2023
Dispositive Motion Deadline	1/31/2023	3/2/2023
Final List of Witnesses and Exhibits	2/28/2023	3/16/2023
Expected trial ready date	3/31/2023	3/31/2023

**IT IS FURTHER ORDERED** that the extension of discovery deadlines requested herein will not require any continuance of this trial date, and this matter shall begin trial beginning on April 3, 2023.

**IT IS SO ORDERED.**

Prepared by:

GARMAN TURNER GORDON LLP

By: /s/ Jared Sechrist

GERALD M. GORDON, ESQ.

JARED SECHRIST, ESQ,

7251 Amigo St., Suite 210

Las Vegas, Nevada 89119

and

MICHAEL D. NAPOLI, ESQ.

*Pro hac vice*

AKERMAN LLP

2001 Ross Avenue, Suite 3600

Dallas, Texas 75201

Tel: (214) 720-4360 / Fax: (214) 720-8116

ARIEL E. STERN, ESQ.

Nevada Bar No. 8276

AKERMAN LLP

1635 Village Center Circle, Suite 200

Las Vegas, Nevada 89134

Tel: (702) 634-5000 / Fax: (702) 380-8572

Email: [ariel.stern@akerman.com](mailto:ariel.stern@akerman.com)

*Attorneys for Tecumseh–Infinity Medical*

*Receivable Fund, LP*